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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$324,650.00 IN  
U.S. CURRENCY,

15 Defendant.  
16

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Valentina  
18 Miles (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 17, 2021, claimant Miles filed a claim in the administrative forfeiture  
20 proceedings with the Drug Enforcement Administration with respect to the Approximately \$324,650.00 in  
21 U.S. Currency (hereafter “defendant currency”), which was seized on August 25, 2021.

22 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
23 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person  
24 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the  
25 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture  
26 proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency

1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
2 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
3 That deadline is February 15, 2022.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to  
5 May 16, 2022, the time in which the United States is required to file a civil complaint for forfeiture against  
6 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be required  
9 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
10 the defendant currency is subject to forfeiture shall be extended to May 16, 2022.

11 Dated: 2/14/2022

PHILLIP A. TALBERT  
United States Attorney

13 /s/ Kevin C. Khasigian  
14 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

15  
16 Dated: 2/8/2022

/s/ Mark J. Reichel  
MARK J. REICHEL  
Attorney for potential claimant  
Valentina Miles

(As authorized via email)

21  
22 **IT IS SO ORDERED.**

23 Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge